

To: Yamada, Richard (Yujiro)[yamada.richard@epa.gov]
From: Vandenberg, John
Sent: Mon 8/14/2017 9:22:12 PM
Subject: FW: OGC input to RFC #17002

Richard,

It was good to see you today in RTP. In response to your request I asked the Office of Environmental Information (the organization that manages the Request for Correction (RfC) process) about the best way to respond to a request from Denka to have a meeting with EPA regarding their RfC. I received a response today - please see below.

Also, Kevin Kirby, the OEI lead, indicated that any requests coming in on the RfC should be routed to him to respond.

We have been meeting to evaluate the RfC and to develop a response. This has included Region 6, OAQPS, OEI, OGC and several of us in NCEA.

Please let me know if you have any questions.

John

From: Kirby, Kevin
Sent: Monday, August 14, 2017 5:00 PM
To: Sheppard, Tracy <Sheppard.Tracy@epa.gov>
Cc: Vandenberg, John <Vandenberg.John@epa.gov>
Subject: RE: OGC input to RFC #17002

Seems our ability to keep flexible on this is important.

Your last point, framing the possibility of a meeting "...conducted as a listening session with no commitments made or implied about how the RFC might be decided" seems key!

Thanks, Tracy! Looking forward to our meeting tomorrow.

KjK

From: Sheppard, Tracy
Sent: Monday, August 14, 2017 4:52 PM
To: Kirby, Kevin <KIRBY.KEVIN@EPA.GOV>
Subject: RE: OGC input to RFC #17002

Our IQGs do not provide for a face-to-face meeting as a matter of policy. There is no legal requirement to provide for such a meeting. All we were mandated to do by the IQA was to establish an administrative mechanism for addressing requests for correction. We could have designed our procedure to provide for such meetings but didn't. If the requestor wants to provide additional written materials in support of their request, that's fine. If the administrator says let them come in to do a presentation, that's fine too. It should be conducted as a listening session with no commitments made or implied about how the RFC might be decided.

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From: Kirby, Kevin
Sent: Monday, August 14, 2017 4:40 PM
To: Sheppard, Tracy <Sheppard.Tracy@epa.gov>
Subject: RE: OGC input to RFC #17002

Thanks, Tracy!

As a heads-up to the questions posed during our Scoping Team Kick-off meeting last week, John was curious about the legal footing we have in declining the “technical meeting” advocated by the requester. Just so you’re aware, I declined this technical meeting with an email to the requester’s representative last month (pasted below). Since then, they have written to the Administrator and to the political appointee of ORD in an attempt to end-run the negative response given.

Seems that some folks just don’t like “no” for an answer...

KjK

Hi Ed,

Thanks for your kind offer to present your report with a technical team, supporting your submitted Request for Correction (RFC #17002). This won't be necessary nor expected as part of the Agency's Information Quality Guidelines.

Your submitted Request for Correction, although extensive and detailed, is well understood by EPA subject matter experts with whom you have already spoken. This information is not new. As you know, these EPA individuals are quite familiar with this and other information supporting the toxicological review of chloroprene as framed in the Integrated Risk Information System (IRIS).

As part of our IGG process, we are currently bringing these and other internal subject matter experts together to consider how best to assess the information presented in the RFC, review the IRIS information and respond to your data quality concerns. Should additional clarification material for this submitted RFR be needed, we'll certainly follow-up with you via the requester's specific point of contact.

Should you have any additional materials to share with EPA relevant to this Request, please don't hesitate to send them to me at Quality@EPA.gov with reference to RFC #17002.

Thank you for your attention in helping us ensure quality information at EPA!

Kevin

Kevin Kirby, IQG Program Manager

-----Original Appointment-----

From: Sheppard, Tracy

Sent: Monday, August 14, 2017 4:33 PM

To: Kirby, Kevin

Subject: Accepted: OGC input to RFC #17002

When: Tuesday, August 15, 2017 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: Telecon: 866 299-3188; 202 566-1656